

**P O R T E R | S C O T T**

A PROFESSIONAL CORPORATION

Stephen E. Horan, SBN 125241

Jaskirat S. Gill, SBN 330595

350 University Avenue, Suite 200

Sacramento, California 95825

TEL: 916.929.1481

FAX: 916.927.3706

**OFFICE OF COUNTY COUNSEL**

**COUNTY OF BUTTE**

Bruce S. Alpert, SBN 075684

Brad J. Stephens, SBN 212246

25 County Center Drive

Oroville, CA 95965

TEL: (530) 538-7621

FAX: (530) 538-6891

Attorneys for Defendants

COUNTY OF BUTTE, BUTTE COUNTY SHERIFF'S DEPARTMENT and KORY L. HONEA

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CANNON HUGH DANIELS, deceased;  
decedent's wife, ARIELE ROSTAMO aka  
ARIELE NELSON; decedent's mother,  
SUSAN ADELL DANIELS; and decedent's  
father, JOSEPH ALBERT DANIELS, IV,  
individually,

Plaintiff,

vs.

COUNTY OF BUTTE; BUTTE COUNTY  
SHERIFF'S DEPARTMENT; KORY L.  
HONEA, individually in his official capacity as  
Butte County Sheriff; COUNTY OF  
SACRAMENTO; SACRAMENTO COUNTY  
SHERIFF'S DEPARTMENT; SCOTT R.  
JONES, individually and in his official capacity  
as Sacramento County Sheriff; OROVILLE  
HOSPITAL; WELLPATH MANAGEMENT,  
INC.; SACRAMENTO COUNTY  
DEPARTMENT of HEALTH SERVICES; and  
DOES 1 to 15, Inclusive,

Defendant

**Case No.: 2:20-CV-00445-JAM-EFB**

**STIPULATION TO EXTEND TIME TO ANSWER  
PLAINTIFF'S COMPLAINT; ORDER**

Compl. Filed: 02/26/20

{02271914.DOCX}

STIPULATION TO EXTEND TIME TO ANSWER PLAINTIFF'S COMPLAINT; [PROPOSED] ORDER

1 This Stipulation is entered into by and between Plaintiffs CANNON HUGH DANIELS, ARIELE  
2 ROSTAMO AKA ARIELE NELSON, SUSAN ADELL DANIELS, and JOSEPH ALBERT DANIELS,  
3 IV (“Plaintiffs”) and Defendants COUNTY OF BUTTE, BUTTE COUNTY SHERIFF’S  
4 DEPARTMENT and KORY L. HONEA (“Defendants”) through their respective counsel of record.

5 On August 4, 2020, Counsel for Plaintiffs and the Defendants filed a Stipulation to Extend Time  
6 giving the Defendants until September 1, 2020 to respond to the complaint. Due to an unforeseen medical  
7 absence from about August 19, 2020 through September 4, 2020 counsel for Defendants requested, and  
8 counsel for Plaintiffs granted, an additional two weeks until September 14, 2020 for Defendants to  
9 respond to the complaint.

10 IT IS HEREBY STIPULATED AND AGREED by the Plaintiffs and the Defendants, by and through  
11 their respective counsel of record, that good cause exists to extend the deadline for Defendants to file a  
12 responsive pleading to September 14, 2020.

13 **IT IS SO STIPULATED.**

14 Date: September 1, 2020

PORTER | SCOTT  
A PROFESSIONAL CORPORATION

16 By /s/ Stephen Horan  
Stephen E. Horan  
17 Jaskirat S. Gill  
18 Attorneys for Defendants

19 Dated: August 31, 2020

ANDREW E. BAKOS & ASSOCIATES

21 By /s/Andrew E. Bakos (Authorized on 8/31/20)  
Andrew E. Bakos  
22 Attorney for Plaintiffs

**ORDER**

PURSUANT TO THE PARTIES' STIPULATION AND GOOD CAUSE APPEARING, the deadline for Defendants to file a responsive pleading to Plaintiffs' Complaint is extended to September 14, 2020.

**IT IS SO ORDERED.**

DATED: 9/1/2020

/s/ John A. Mendez  
United States District Court Judge

{02271914.DOCX}